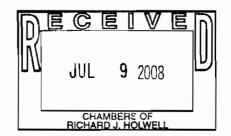


ATTORNEYS AT LAW

Proctors in Admiralty
91 W. CHERRY STREET
HICKSVILLE, NEW YORK 11801

(516) 931-0064 TELEFAX (516) 931-4313



HAROLD M. KINGSLEY JOAN S. KINGSLEY STEVEN P. CALKINS KEVIN T. MURTAGH

USDC SDNY
DOCUMENT
ELECTRONICALLY
DOC #:
DATE FILED: 1/4/08

July 9, 2008

Hon. Richard J. Holwell United States District Court Southern District of New York 500 Pearl Street, RM 1950 New York, NY 10007 Via Fax: (212) 805-7948

RE: Ferrostaal Metals Group, Inc. v. M/V SPAR CANIS, et al.

07 CIV 11076 (RJH) Our Ref: FS 7955

Hon. Sir:

We represent the plaintiff herein. Pursuant to the scheduling order that was so ordered by the Court on March 20, 2008, discovery is due to be completed by July 11, 2008, and a pretrial conference is to be held on Friday, July 18, 2008, at 10:30 A.M. We respectfully request an extension of the discovery schedule and an adjournment of the pretrial conference. This is the first request for an extension of the discovery schedule and adjournment of the pretrial conference. Counsel for defendants Spar Shipholding and Fleet Management Ltd join in this request.

This is a maritime action alleging negligence and breach of contract and bailment by carriers during transportation of plaintiff's cargo. We were discussing possible settlement of the claims with the insurance correspondent for defendant S.K. Shipping Ltd. We were unable to reach a settlement and we served various banks with a Rule B attachment however, we have yet to locate any funds in this district. We have instructed defendant S.K. Shipping's insurance correspondents to appoint counsel since we are unable to reach a settlement.

Thus, we respectfully request a 60 day extension of time to allow attorneys for S.K. Shipping Ltd. to appear, and to complete discovery. We also respectfully request the pretrial conference scheduled for Friday, July 18, 2008, be adjourned to a time after the new end of discovery date.

Thank you.

applicati Gentel The 7/18/08 confiner
is alignmento
to 9/12/08 at 10:00 pm

Respectfully,

cc:

BLANK ROME, ESQS. The Chrysler Building 405 Lexington Avenue New York, NY 10174

So Opdelen Fax

TO 10

Attn: Thomas H. Belknap, Esq.

714/08